



The Simon Law Firm, P.C.
Attorneys and Counselors at Law

May 7, 2015

Raymond C. Bosch
Attorney Advisor
11201 Renner Boulevard
Lenexa, Kansas 66219

Re: Guignon, James et al., v. Ritchie Enterprises, Inc., d/b/a Puroclean Emergency Restoration Services/Purosystems, Inc., d/b/a PuroClean/Joseph J. Ritchie and Joanna C. Ritchie
Date of Incident: 2/27/2011
Location: New Haven, Missouri

Dear Mr. Bosch:

Please consider this correspondence as our formal request for information available pursuant to the Freedom of Information Act. My firm represents James Guignon, et al., in regards to a fire and subsequent restoration work by Ritchie Enterprises, Inc., d/b/a Puroclean Emergency Restoration Services, at their residence located at 4264 Highway KK, New Haven, in Franklin County, Missouri. Please make note that Attorney Julie Ostrum no longer represents the Guignons. It is my understanding Julie Ostrum made a prior request and has withdrawn her request. I am now reasserting a new formal request for this matter.

It is our understanding that the EPA has participated in the response and investigation of the above mentioned incident. As a result, under the Freedom of Information Act, we are requesting all documentation, including but not limited to: reports, plans, diagrams, communications between agencies (whether by correspondence, fax, email, memorandum or other), any and all statements of witnesses, any and all photographs or video, inspection reports, search and rescue reports, fire department reports, evidence reports, investigative reports, and/or any other documentation in your possession involving this incident.

I have enclosed an affidavit for your convenience. Please include this affidavit with any records produced under this Freedom of Information Act request. If you have any questions regarding this request, please contact me at the number listed below. Thank you for your time and assistance in this matter.

Very truly yours,

A handwritten signature in black ink that reads "Erica Blume". The signature is written in a cursive style with a large, stylized "E" and "B".

Erica F. Blume

EFB/lmb
Enclosure



STATE OF _____)

COUNTY OF _____)

AFFIDAVIT

Before me, the undersigned authority, personally appeared _____
_____ (name and title), who being duly sworn by me,
deposed as follows:

My name is _____ (name), I am of sound mind, capable of
making this affidavit and personally acquainted with the facts herein stated:

I am the custodian of records of _____ (facility name).
Attached hereto are _____ (# of pages) of record from _____
(facility name) in the regular course of business, and it was in the regular course of
business of _____ (facility name) for an employee or
representative of _____ (facility name), with knowledge of
the act, event, condition, opinion, or diagnosis recorded to make the record or to
transmit information thereof to be included in such record; and the record was
made at or near the time of the act, event, condition, opinion or diagnosis. The
_____ (# of pages) of record attached hereto are the original or exact duplicate of
the original.

Custodian of Records

In witness whereof, I have hereunto subscribed my name and affixed my official
seal this _____ day of _____, 20_____.

Notary